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13 UNITED STATES DISTRICT COURT
14 DISTRICT OF NEVADA
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16 ALLSTATE INSURANCE COMPANY,
17 ALLSTATE PROPERTY & CASUALTY
INSURANCE COMPANY, ALLSTATE
18 INDEMNITY COMPANY, and ALLSTATE
FIRE & CASUALTY INSURANCE
19 COMPANY,

20 Plaintiffs,

21 v.

22 RUSSELL J. SHAH, MD, DIPTI R. SHAH,
MD, RUSSELL J. SHAH, MD, LTD., DIPTI
23 R. SHAH, MD, LTD., and RADAR
MEDICAL GROUP, LLP dba UNIVERSITY
24 URGENT CARE, DOES 1-100, and ROES
101-200,

25 Defendants.

26 AND RELATED CLAIMS
27
28

CASE NO. 2:15-cv-01786-APG-CWH

**STIPULATION TO INCLUDE NETTLES
LAW FIRM INTO THE STIPULATED
CONFIDENTIALITY AND PROTECTIVE
ORDER (ECF NO. 39) FOR THE
DISCLOSURE OF DOCUMENTS
PURSUANT TO F.R.C.P. 45 SUBPOENA**

1 Plaintiffs/Counter-defendants ALLSTATE INSURANCE COMPANY, ALLSTATE
2 PROPERTY & CASUALTY INSURANCE COMPANY, ALLSTATE INDEMNITY COMPANY,
3 and ALLSTATE FIRE & CASUALTY COMPANY (collectively referred to as the "Plaintiffs"), and
4 the NETTLES LAW FIRM (non-party herein after referred to as "NETTLES") hereby stipulate and
5 agree as follows:

6 1. Plaintiffs served NETTLES with a subpoena pursuant to F.R.C.P. 45 for the production
7 of documents regarding communications and payments made by and between Law Firm and the
8 Defendants during NETTLES' representation of certain clients in personal injury claims for which
9 Plaintiffs paid on settlement on behalf of Plaintiffs' insureds.

10 2. NETTLES provided a written objection to the Rule 45 subpoena.

11 3. NETTLES is aware that Plaintiffs have subpoenaed several law firms seeking the same
12 type of information pursuant to Rule 45 in this case, as well as a companion sister-lawsuit *Allstate v.*
13 *Belsky, et. al. Case No. 2:15-cv-00065-MMD-CWH ("Belsky")*.

14 4. NETTLES understands that this Court presides over both the instant matter as well as
15 the *Belsky* matter, and that this Court has ruled consistently in both these cases and ordered other law
16 firms to produce the same type of documents request of NETTLES.

17 5. A stipulated confidentiality and protective order in this case entered between Plaintiffs
18 and Defendants for the disclosure of confidential, sensitive or other protected information was
19 approved by this Court on May 20, 2016. (ECF No. 39).

20 6. NETTLES was not a party to the stipulated confidentiality and protective order. (ECF
21 No. 39).

22 7. In ordering compliance with Plaintiffs' subpoenas to other law firms, this Court also
23 ordered that the confidentiality and protective order (ECF No. 39) be applied to those law firms.

24 8. In accordance with this Court's prior rulings both in this action and in the *Belsky*
25 matter, the parties hereby stipulate and agree that the protections and scope articulated in the
26 Stipulated Confidentiality and Protective Order approved by this Court on May 20, 2016. (ECF No.
27 39) be extended in their entirety to cover NETTLES in its compliance with Plaintiffs' subpoena.

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1 9. NETTLES will produce all documents responsive to the subpoena within ten (10) days
2 of approval and entry of this Order by the Court.

3 IT IS SO STIPULATED.

4 Dated: 1/3/19

Dated: 01/03/2019

5 McCORMICK, BARSTOW, SHEPPARD,
6 WAYTE & CARRUTH LLP

NETTLES LAW FIRM

7 By: 

By: 

8 DYLAN P. TODD, ESQ.

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11
12 **ORDER**

13 IT IS SO ORDERED.

14 DATED this 14 day of January 2019.

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16 
17 UNITED STATES MAGISTRATE JUDGE
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